

WILLKIE FARR & GALLAGHER_{LLP}

BENJAMIN P. MCCALLEN
212 728 8182
bmccallen@willkie.com

787 Seventh Avenue
New York, NY 10019-6099
Tel: 212 728 8000
Fax: 212 728 8111

August 16, 2017

VIA ECF

Honorable Andrew J. Peck
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *BSG Resources (Guinea) Limited, et al. v. Soros, et al.*, No. 1:17-cv-02726 (JFK) (AJP)

Dear Judge Peck,

I write in response to Plaintiffs' letter of this morning. Plaintiffs' representation that the August 24 conference was chosen to accommodate Defendants' vacation schedules is inaccurate. The entirety of the discussion on the scheduling of that conference occurred on the record, which contains no such reference. *See* Transcript at 23:10-24:25. Plaintiffs' also argue that if Defendants had wanted a meet a confer before the August 24 conference, "Defendants could have served their discovery responses more promptly." However, Defendants served their requests for production on July 24, 2017, six days after the July 18, 2017 conference before Your Honor. The fact that Plaintiffs so strenuously object to Defendants' proposal – which merely asks that Plaintiffs serve their responses three business days early, or that the conference be adjourned four days – demonstrates that they are trying to engineer a conference where they can push forward discovery on Defendants, while denying Defendants the same opportunity.

Respectfully Submitted,



Benjamin P. McCallen